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VIA ECF

Hon. Lorna G. Schofield
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *US Airways, Inc., for American Airlines, Inc. as Successor and Real Party in Interest v. Sabre Holdings Corp., et al., No. 1:11-cv-02725-LGS*
Uncontested Request Regarding Submission of Deposition Designations and Written Discovery Designations via Upload Link to Chambers

Dear Judge Schofield:

We submit this joint letter on behalf of the parties regarding the upcoming submission of the parties' deposition designations and written discovery designations as part of the joint pretrial order, which is due tomorrow, March 31, pursuant to the Court's March 3, 2022 scheduling order. ECF No. 1108. In the interests of efficiency and reducing the burden on the Court and all parties implicated by the designations, the parties jointly ask for permission to submit the deposition designations and written discovery designations via upload link directly to the Court rather than filing the designations on ECF, per the same procedure applicable to digital copies of the exhibits. *See id.*

The current set of designations is voluminous and includes deposition testimony and written discovery that was designated under the Protective Order by the parties and/or third parties and that has not previously been made public. But the parties are working to narrow the designations and the objections that the Court will need to resolve at trial. This narrowing of designations will, in turn, reduce the amount of confidential information at issue for trial.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Andrew J. Frackman'.

Andrew J. Frackman
of O'MELVENY & MYERS LLP
*for US Airways, Inc. for American Airlines, Inc. as
Successor and Real Party in Interest*



cc: Counsel for Sabre (via ECF)